

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Jose A. Sierra, Jr. Mary E. Smeltzer,	: : : : : :	Case No.: 23-12704 Chapter 13 Judge Ashely M. Chan *****
Debtors.	: : :	Related Document No. 30

**OBJECTION OF NEW RESIDENTIAL MORTGAGE LOAN
TRUST 2018-1 TO THE CONFIRMATION PLAN (DOCKET NUMBER 30)**

New Residential Mortgage Loan Trust 2018-1 (“Creditor”), by and through its undersigned counsel, objects to the confirmation of the currently proposed plan (“Plan”), filed by Jose A. Sierra, Jr. and Mary E. Smeltzer (collectively, “Debtor”), as follows:

1. Creditor holds a security interest secured by a mortgage lien on Debtor’s property commonly known as 196 Blue Ridge Drive, Levittown, PA 19057 (“Property”).
2. Creditor intends to file a Proof of Claim in the approximate amount of \$23,106.74. This amount includes an approximate pre-petition arrearage in the amount of \$15,711.28.
3. Debtor’s Plan fails to provide for Creditor’s secured claim.
4. Upon information and belief, Debtor still holds an interest in the Property.
5. As a result, Debtor’s Plan fails to meet the requirements of 11 U.S.C. §1325(a)(5) as it fails to provide for a secured claim. Creditor requests that Debtor amend the Plan to

either provide for or surrender Creditor's claim.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Plan.

Respectfully submitted,

/s/Alyk L. Oflazian

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Attorneys for Creditor

The case attorney for this file is Alyk L. Oflazian.

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CERTIFICATE OF SERVICE

I certify that on the date of filing, a copy of the foregoing Objection to Confirmation of Plan was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Scott F. Waterman, Chapter 13 Trustee, ECFMail@ReadingCh13.com

JEFFERY A. FOURNIER, Attorney for Jose A. Sierra, Jr. and Mary E. Smeltzer,
jefffournier@verizon.net

I certify that on the date of filing, a copy of the foregoing document was sent by U.S. Mail to the following:

Jose A. Sierra, Jr. and Mary E. Smeltzer, 196 Blue Ridge Dr., Levittown, PA 19057

/s/Alyk L. Oflazian